

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

<b>TEKLINKS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>CIVIL ACTION NO. 3:15-cv-908</b>
<b>PRESYS DATA, LLC,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**STATEMENT OF MATERIAL FACTS**

COMES NOW Plaintiff TekLinks, Inc. (the “Plaintiff”), in the above-styled action, and in support of its Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, filed concurrently herewith, submits this Statement of Material Facts:

1. At Defendant’s request, Plaintiff provided certain goods and services (the “Products”) to Defendant at 101 Forrest Crossing Blvd, Suite 107, Franklin, Tennessee 37064 and 103 Confederate Drive, Suite 2, Franklin, Tennessee 37064, as demonstrated by and more specifically described in multiple invoices dated December 16, 2014 through April 20, 2015 (collectively, the “Invoices”), which Plaintiff has previously sent to Defendant. *See* Complaint ¶ 6; Answer ¶ 6.

RESPONSE:

2. On June 10, 2015, Plaintiff sent a letter to Defendant demanding payment in full of all amounts owed under the Invoices (the “Demand Letter”). *See* Complaint ¶ 8; Answer ¶ 8.

RESPONSE:

3. As stated in the affidavit of Robert K. Mills, Chief Financial Officer of Plaintiff (the "Affidavit"), filed concurrently herewith, Defendant has refused and/or failed to make any payments to Plaintiff on the amount owed under the Invoices, after demand. Affidavit ¶ 5.

RESPONSE:

4. As of October 6, 2015, after applying all credits due under the Invoices, the total amount owed under the Invoices is \$416,234.78, plus interest at the rate of 1.5% per month, which continues to accrue (the "Indebtedness"). This amount is verified by the Affidavit. Affidavit ¶ 6.

RESPONSE:

Respectfully submitted,

**TEKLINKS, INC.**

By: /s/ J. Leland Murphree  
J. Leland Murphree  
Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing on the following by either placing same in the United States mail, postage prepaid and properly addressed, or electronically through the CM/ECF system on this the 7<sup>th</sup> day of October, 2015.

Jill M. Hudson  
1031 Westhaven Blvd.  
Franklin, Tennessee 37064

/s/ J. Leland Murphree  
OF COUNSEL